

### REMARKS

Claims 1-23 are pending.

Claims 1-5, 7, 9-12 and 14 have been amended. Support for the claim 1 and claim 2 amendments can be found, for example, in FIG. 1A and the associated description. Claims 3, 4, 7, and 9-12 have been amended to correct their dependencies. Claims 5, 10, 11 and 14 have been amended to correct typographical errors.

Claims 15-23 are new. Support for the new claims can be found, for example, in the figures and in paragraph [0010] of the published application.

No new matter has been added.

### Claim Rejections – 35 U.S.C. §102

Claim 1 was rejected under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 4,057,012 (Heidemann).

Claim 1 has been amended to recite a method of printing that includes combining flexographic printing with intaglio printing in a common press, where the common printing press is arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate.

Without limiting the scope of the claims, the claimed subject matter can be appreciated with reference to FIG. 1, which shows a web fed printing press 10 that includes a flexographic printing units 14 arranged in series with an intaglio printing unit 17. A web substrate 11 is shown passing through the flexographic printing units 14 and the intaglio printing unit 17, so that flexographic and intaglio printing can occur simultaneously on the web substrate 11. The Heidemann patent does not disclose or render obvious the claimed subject matter.

The Heidemann patent discloses a printing press that is convertible between intaglio printing and flexographic printing. *See* Title. The Heidemann printing press, therefore, can perform either intaglio printing or flexographic printing, but not both simultaneously on a web substrate, as recited in claim 1.

Claim 1 should be allowable for at least the foregoing reasons.

Claim 2, 12 and 13 were rejected under 35 U.S.C. §102(b) as anticipated by the Heidemann patent.

Claim 2 has been amended in a manner similar to claim 1. Claim 2 now recites a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate.

The Heidemann patent does not disclose or render obvious the claimed subject matter. As indicated above, the Heidemann patent discloses a printing press that is convertible between intaglio printing and flexographic printing. *See* Title. The Heidemann printing press, therefore, can perform either intaglio printing or flexographic printing, but not both simultaneously on a web substrate, as recited in claim 2.

Claim 2 should be allowable for at least the foregoing reasons.

Claims 12 and 13 depend from claim 2 and, therefore, should be allowable for at least the same reasons as claim 2.

#### Claim Rejections – 35 U.S.C. §103

Claims 3, 4 and 11 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Heidemann in view of U.S. Patent No. 5,748,806 (Gates).

Claims 3, 4 and 11 depend from claim 2, which recites a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate.

As discussed above, the Heidemann patent does not disclose or render obvious the claimed subject matter. Nor does the Gates patent, alone or in combination with the Heidemann patent, disclose or render obvious the claimed subject matter.

The Gates patent relates to a host-adaptor system for sharing information between intelligent devices connected to a common data exchange bus. *See* Col. 1, lines 33-40. The Gates patent does not relate to web fed printing presses. Nor does the Office action suggest otherwise. It is clear, therefore, that the Gates patent, either alone or in combination with the Heidemann patent, does not disclose or otherwise render obvious a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate, as recited in claim 2 and, therefore, incorporated into claims 3, 4 and 11.

Claims 3, 4 and 11 should be allowable for at least the foregoing reasons.

Claims 6 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Heidemann patent, in view of the Gates patent and further in view of U.S. Patent No. 5,033,378 (Ebihara).

Claims 6 and 14 depend from claim 2, which recites a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate.

As discussed above, neither the Heidemann patent, nor the Gates patent, nor any combination thereof, discloses or renders obvious the claimed subject matter. Nor does the Ebihara patent, alone or in combination with the other cited patents, disclose or render obvious the claimed subject matter.

The Ebihara patent discloses a defective print detecting device for determining the quality of prints which are printed by an intaglio printing apparatus. *See* claim 1. The Ebihara does not

mention flexographic printing at all. It is clear, therefore, that the Ebihara patent, either alone or in combination with the other cited references, does not disclose or render obvious a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate, as recited in claim 2 and, therefore, incorporated into claims 6 and 14.

Claims 6 and 14 should be allowable for at least the foregoing reasons.

Claims 5 and 7 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Heidemann patent, in view of the Gates patent and further in view of U.S. Patent No. 4,684,269 (Miki).

Claims 5 and 7 depend from claim 2, which recites a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate.

As discussed above, neither the Heidemann patent, nor the Gates patent, nor any combination thereof, discloses or renders obvious the claimed subject matter. Nor does the Miki patent, alone or in combination with the other cited references, disclose or render obvious the claimed subject matter.

The Miki patent discloses a composite printing apparatus which is capable of two different modes of printing, *i.e.*, printing by means of type elements or type fonts, and dot-matrix printing with a matrix of dots. *See* col. 1, lines 8-12. The Miki patent does not mention flexographic printing or intaglio printing. It is clear, therefore, that the Miki patent, either alone or in combination with the other cited references, does not disclose or render obvious a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate, as recited in claim 2 and, therefore, incorporated into claims 5 and 7.

Claims 5 and 7 should be allowable for at least the foregoing reasons.

Claim 8 was rejected under 35 U.S.C. §103(a) as unpatentable over the Heidemann patent in view of the Miki patent.

Claim 8 depends from claim 2, which recites a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate.

For at least the reasons discussed above, neither the Heidemann patent, nor the Miki patent, nor any combination thereof, discloses or renders obvious the claimed subject matter.

Claim 8 should be allowable for at least the foregoing reasons.

Claims 9 and 10 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Heidemann patent in view of the Gates patent and further in view of U.S. Patent No. 3,878,517 (Kasubuchi).

Claims 9 and 10 depend from claim 2, which recites a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate.

As discussed above, neither the Heidemann patent, nor the Gates patent, nor any combination thereof, discloses or renders obvious the claimed subject matter. Nor does the Kasubuchi patent, alone or in combination with the other cited references, disclose or render obvious the claimed subject matter.

The Kasubuchi patent discloses an ink jet system printer wherein ink drops issuing at a constant rate from a nozzle are charged in accordance with charging signals and, then deflected in accordance with the charges carried by the drops as they pass through a fixed electric field. *See Abstract*. The printer includes a servo motor 40 that is mechanically coupled to a printing

head 1. *See* Col. 4, lines 54-56 and FIG. 1. The Kasubuchi patent does not mention flexographic or intaglio printing. It is clear, therefore, that the Kasubuchi patent, either alone or in combination with the other cited references, does not disclose or render obvious a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module where the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate, as recited in claim 2 and, therefore, incorporated into claims 9 and 10.

Claims 9 and 10 should be allowable for at least the foregoing reasons.

#### New Claims

New claims 15-21 depend, directly or indirectly, from claim 2 and, therefore, should be allowable for at least the same reasons as claim 2.

New claim 22 depends from claim 1 and, therefore, should be allowable for at least the same reasons as claim 1.

New claim 23 recites, inter alia, a web fed printing press that includes at least one flexographic printing module and at least one intaglio printing module, wherein the at least one flexographic printing module and the at least one intaglio printing module are arranged so that flexographic and intaglio printing can occur simultaneously on a web substrate.

For at least the reasons discussed herein, none of the cited references discloses or renders obvious the claimed subject matter.

New claim 23 should be allowable for at least the foregoing reasons.

#### Claim Objections

The Office objected to claims 3 and 12 for lacking proper antecedent basis for some of the claim terms.

Applicant has amended claims 3 and 12 to provide proper antecedent basis and respectfully requests that these objections be withdrawn.

Conclusion

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

The excess claim fee in the amount of \$75.00 is being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account Authorization. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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